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PRATT & WHITNEY Voluntary Corrective Action Program Progress Report for Third Quarter 2002

PREPARED FOR

U.S. EPA Region I

JFK Federal Building Boston, MA



Loureiro Engineering Associates, Inc.

October 11, 2002

U.S. EPA New England - Region I Mail Code HBT One Congress Street, Suite 1100 Boston, MA 02114-2023

Attn.: Mr. Ernest Waterman

RE: 24th Progress Report

Pratt & Whitney Voluntary Corrective Action Program

LEA Comm. No. 68VA109

Dear Mr. Waterman:

Please find enclosed four copies of our 24th Voluntary Corrective Action Program Progress Report. As discussed, we will be submitting similar reports on a quarterly basis.

If you have any questions, please call me at (860) 747-6181.

Sincerely,

LOURE PRO ENGINEERING ASSOCIATES, INC.

Jeffrey J. Loureiro, P.E.

President

pc: Lauren Levine, United Technologies Corporation

David Ringquist, CT DEP

Manu Sharma, Gradient Corporation

PRATT & WHITNEY VOLUNTARY CORRECTIVE ACTION PROGRAM PROGRESS REPORT FOR THIRD QUARTER 2002

Prepared for

U.S. EPA New England - Region I JFK Federal Building Boston, MA

October 2002

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ACRONYMS

| CMS/CMI | Corrective Measures Study/Corrective Measures Implementation |
|---------|--|
| CT DEP | Connecticut Department of Environmental Protection |
| CT DPH | Connecticut Department of Public Health |
| EI | Environmental Indicator |
| ELUR | Environmental Land Use Restriction |
| EPA | United States Environmental Protection Agency, Region I |
| LEA | Loureiro Engineering Associates, Inc. |
| LNAPL | Light Non-Aqueous Phase Liquid |
| RCRA | Resource Conservation and Recovery Act |
| RFI | RCRA Facility Investigation |
| TM | Technical Memorandum |
| USTM | Unit-Specific Technical Memorandum |
| UTC | United Technologies Corporation |
| VCAP | Voluntary Corrective Action Program |
| | |



UNITED TECHNOLOGIES CORPORATION PRATT & WHITNEY

Voluntary Corrective Action Program Progress Report for Third Quarter 2002

1. INTRODUCTION

1.1 General

This Progress Report is the 24th in a series of progress reports to be prepared and issued on a quarterly basis during the Voluntary Corrective Action Program (VCAP). The progress reports are intended to provide the Environmental Protection Agency, Region I (EPA) with an overview of (1) the work performed during the reporting period, (2) a look ahead at activities planned for the next reporting period, and (3) the progress of interim measures being implemented. The progress reports also serve as the vehicle for conveying minutes of the semiannual progress meetings with EPA and for summarizing key program issues that have arisen during the reporting period. The progress reports are not intended as a substitute for technical reports summarizing investigation and/or remediation activities, which will be prepared as appropriate throughout the course of the Program. Please see the individual site discussions for mention of any impending or submitted technical reports.

1.2 VCAP Schedule and EPA Comments

Of the five Connecticut Pratt & Whitney VCAP stabilization sites, only two, Willgoos and East Hartford Main Street, have not yet demonstrated compliance with both CA 725 and CA 750. A revised draft Environmental Indicator (EI) determination for Groundwater Migration Under Control for the Willgoos facility was submitted on February 8, 2002. It is anticipated that the EI will be finalized in October 2002, demonstrating stabilization at the site. It is anticipated that completion of stabilization activities at the East Hartford Main Street facility will occur in 2003.

1.3 Semiannual Progress Meeting

A Semiannual Progress Meeting was held on July 25, 2002 at EPA in Boston, MA. Participants included Ernie Waterman, Carolyn Casey, Aaron Gilbert, Juan Perez, Lauren Levine, Phil Sheridan, Joe Tota, Brian Quillia, Manu Sharma, and Jeff Loureiro. During the meeting, a status update and a review of recent submittals was provided for each site. Additional information on issues discussed is provided below by facility. The next meeting is planned for early in 2003.

East Hartford

A summary of the completed Willow Brook Pond remediation project was presented to EPA. Juan Perez indicated that he expects to finalize the Statement of Basis by the end of their fiscal year. There is a 45-day comment period after the public notice so Juan expects that EPA will render a final decision by the end of the calendar year.



The Step 4 groundwater investigation results were also presented. A general discussion regarding the structure of the EI documents for the Main Street Site and the Airport/Klondike ensued. Juan will get back to United Technologies Corporation (UTC) with respect to whether a single EI or separate EIs will be required for the Main Street facility and for the Airport/Klondike.

The Stadium parcel and the status of the dioxin area risk assessment in the south airport were also discussed. As with Willow Pond, Juan indicated that he expects to wrap up the statement of basis by the end of the fiscal year and render a final decision by the end of the calendar year. With respect to the dioxin area risk assessment, UTC explained that the Connecticut Department of Environmental Protection (CT DEP) and the Connecticut Department of Public Health (CT DPH) had reviewed the document and submitted comments which were addressed in a subsequent submittal.

Middletown

Carolyn indicated that she had an EPA contractor reviewing the EI's and that she expects to have draft comments in four to six weeks.

Southington ORO

Carolyn stated that she may approve the human health EI by the end of the calendar year but that she was not sure when she would complete the groundwater EI. She also stated that she was reviewing the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report and Corrective Measures Study/Corrective Measures Implementation (CMS/CMI) and that she had a concern with respect to indoor air on the west side of the River.

North Haven and Rocky Hill

Results of stabilization monitoring were discussed for both facilities. No exceedances have been detected in the monitoring at either facility.

2. COMPLETED INVESTIGATION ACTIVITIES (LAST THREE MONTHS)

This section provides a brief description of the investigation activities undertaken at each site during the last three months. Maps showing sampling locations updated through the reporting period are provided in the Appendices along with laboratory analytical data tables inclusive of data received through the reporting period, as appropriate.

2.1 East Hartford

2.1.1 Klondike

EPA, UTC, and Loureiro Engineering Associates, Inc. (LEA) have been working cooperatively in the preparation of the report for the Airport/Klondike area. For this reason, and to avoid duplication, no additional information is provided in this Progress Report.



2.1.2 Main Plant

Construction activities associated with the remediation of Willow Brook and Willow Brook Pond continued through this quarter. Activities completed during this reporting period included equipment decontamination activities including heavy mechanical equipment and steel sheet piles; treatment of the decontamination wastewaters; decommissioning and off-site disposal of the decontamination facilities; restoration of the disturbed areas of the site; off-site disposal of previously excavated stockpiled material including 855 tons (project total to date is 66,706 tons) of contaminated soil, sediment, stone and sediment from the decontamination facilities and concrete; documentary surveys; construction of the engineered control (cap) and related restorations within the oil/water separator; and preparation of the fifth quarterly progress report detailing the above activities. A copy of the Willow Brook and Willow Brook Pond progress report was delivered to the CT DEP and mailed to the EPA on September 27, 2002.

The construction activities were completed August 31, 2002. In accordance with the approved schedule, the post-remediation report, including the draft Environmental Land Use Restrictions (ELURs), will be submitted by November 1, 2002.

2.2 Willgoos

UTC submitted a revised *Documentation of EI Determination for Current Human Exposures Under Control* for the UTC/Pratt & Whitney Willgoos facility located on Pent Road in East Hartford, Connecticut on October 12, 2001. EPA provided formal concurrence to UTC's demonstration that Human Exposures are controlled on December 13, 2001.

Applicable comments received during the finalization of the Human Exposure EI were incorporated into a revised draft *Documentation of EI Determination for Groundwater Migration Under Control*. This revised draft groundwater EI was submitted on February 8, 2002. EPA and UTC have worked together towards finalizing the EI and it is anticipated that stabilization at the site will be demonstrated during the next reporting period. As mentioned above, it is anticipated that the groundwater EI will be finalized in October 2002.

In accordance with the groundwater sampling plan, outlined in the Human Exposures EI, groundwater sampling was completed in August 2002 for select wells within the facility's fuel farm, to verify that nearby residential areas are not impacted by the presence of contaminated groundwater. An additional groundwater sample was collected in September 2002 to verify the results from a groundwater sample collected in August 2002.

One additional monitoring well was installed in the vicinity of the northwest courtyard area in August 2002 to further delineate light non-aqueous phase liquids (LNAPL) present in an adjacent well.

- 2.3 Colt Street Stabilized
- 2.4 Rocky Hill- Stabilized
- 2.5 North Haven Stabilized



3. PLANNED ACTIVITIES (NEXT THREE MONTHS)

This section provides a brief description of the investigation activities planned at each site during the next three months.

3.1 East Hartford

3.1.1 Klondike

Preparation of sections of the summary report documenting the Airport/Klondike investigation and remediation to satisfy the RCRA Corrective Action requirements will be continuing. Together with the sections of the summary report, presentation of Technical Memoranda (TMs) will continue during future review meetings. All proposed Unit-Specific Technical Memoranda (USTMs), which address the unit-specific soil investigations, have been submitted to EPA. The remaining sections of the summary report will be submitted by the end of 2002.

EPA, UTC, and LEA continue to work cooperatively in the review of documents relating to the North Parcel of the Airport/Klondike. The documents include the North Parcel report (prepared by LEA) documenting investigation/remediation activities performed at the following environmental units: former Silver Lane Pickle Company; the North Klondike Undeveloped Land Outside Storage Area; the North Klondike Undeveloped Land Soil Piles; the former Army Barracks Area; and the Rentschler Airport Area) and the Marin Report (prepared by Marin Environmental Inc. for the Connecticut Office of Policy and Management for the transfer of the Stadium parcel).

The North Parcel includes an approximately 72-acre parcel (Stadium Parcel) and an approximately 3-acre parcel (Supplemental Stadium Parcel) that have been transferred to the State of Connecticut for a football stadium. UTC has submitted a letter to the EPA requesting that the EPA begin the process of releasing the Stadium Parcel from corrective action obligations, based on the prior investigation and the EPA review, indicating that there are no environmental issues on that parcel. UTC made a joint decision with the EPA to include the 3-acre Supplemental Stadium Parcel as part of the release from corrective action obligations since additional remediation activities have been completed on that site. Fuss & O'Neill, Inc, the State's consultant, has prepared a Remedial Action Report documenting these activities and this has been forwarded to the EPA. UTC has also prepared a draft Statement of Basis for the combined 75-acre Stadium Site and submitted it for the EPA's use.

Comments on the Statement of Basis have recently been received and the revised Statement of Basis is expected to be forwarded to EPA by the end of October 2002.

3.1.2 Main Plant

Site activities associated with the remediation and restoration of Willow Brook and Willow Brook Pond continued through this quarter. The construction activities were completed August 31, 2002. Planned activities to be performed during the next reporting period include the completion of the Remedial Activities Summary Report; post-remediation monitoring and maintenance activities; and recordation of the necessary ELURs.



3.2 Willgoos

It is anticipated that the *Documentation of Environmental Indicator Determination - Groundwater Migration Under Control* will be finalized in October 2002.

An indoor air monitoring event was performed at the facility in July 2002. The results will be submitted to EPA during the following reporting period.

- 3.4 Colt Street

 Stabilized
- 3.5 Rocky Hill- Stabilized
- 3.5 North Haven Stabilized

The next stabilization monitoring event including groundwater and surface water monitoring at the former Pratt & Whitney facility in North Haven Connecticut is scheduled for October 2002.

4. INTERIM MEASURES

This section provides a summary of some of the interim measures undertaken during this VCAP progress-reporting period. UTC/Pratt & Whitney is continuing to collect information on interim measures performed at each site and will provide a summary of any additional interim measures identified in the subsequent progress reports.

No interim measures were performed at the East Hartford, Willgoos, Colt Street, Rocky Hill or North Haven facilities during this reporting period.

